

# IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

Sarah Buntura,

Plaintiff,

v.

Ford Motor Company and

Judge J. Philip Calabrese, in his individual capacity,

Defendants.

Case No. 1:25-cv-01429

Judge Pamela A. Barker

FILED  
JUL 11 2025  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

## MOTION TO CORRECT CERTIFICATE OF SERVICE, REQUEST FOR ALTERNATE SERVICE, AND REQUEST FOR PERMISSION TO FILE ELECTRONICALLY (CM/ECF)

Plaintiff Sarah Buntura respectfully submits this motion to:

1. Correct a previously filed Certificate of Service,
2. Request permission to serve Defendant Judge J. Philip Calabrese, in his individual capacity, at the courthouse, and
3. Request leave of Court to electronically file documents using the CM/ECF system.

### Correction of Prior Certificate of Service

On July 10, 2025, Plaintiff filed a Certificate of Service stating that service on both Defendants—Ford Motor Company and Judge J. Philip Calabrese—would be completed via U.S. Mail on July 11, 2025. That filing was made in good faith based on Plaintiff's intent to proceed with service.

However, after reviewing the applicable rules, Plaintiff now understands that serving a federal judge at their place of work requires prior Court approval. Plaintiff therefore submits this motion to correct the record and clarify that Judge Calabrese has not yet been served, and that no service mailing has been sent. Plaintiff will not proceed with service until the Court grants permission.

# Motion for Alternate Service and CM/ECF Filing Access

## I. Request for Alternate Service on Defendant Judge Calabrese

Plaintiff respectfully moves this Court to authorize alternate service on Defendant **Judge J. Philip Calabrese**, who is named in his **individual capacity**. Because Judge Calabrese's residential address is not publicly available and personal service is impractical given his judicial status, Plaintiff requests permission to serve him by:

1. **Certified mail with return receipt requested** to the following courthouse address:

**Judge J. Philip Calabrese**  
Carl B. Stokes U.S. Courthouse  
801 West Superior Avenue  
Cleveland, OH 44113

2. **Alternatively**, Plaintiff requests that the Court deem service satisfied by **filing this motion and related materials via the CM/ECF system**, which provides actual notice to Judge Calabrese and his chambers, given his active status on the Court. This form of service would be efficient, secure, and consistent with the principles of due process and judicial economy.

This request is made pursuant to **Federal Rule of Civil Procedure 4(e)(1)** and **Ohio Civ. R. 4.1(A)(1)(a)**, which permit service by certified mail and authorize courts to approve **alternate means of service** when standard service is not feasible or appropriate under the circumstances.

## II. Request for CM/ECF Filing and Access

Plaintiff also respectfully requests permission to file documents electronically and receive notices via the Court's **CM/ECF system** in this case. Given the nature of the claims, the volume of filings, and the need for timely access to Court communications, Plaintiff seeks permission to:

- File pleadings, motions, and exhibits electronically;
- Receive electronic service of orders and filings from the Court and opposing parties;
- Comply with all CM/ECF rules and procedures applicable to pro se filers.

This request is made in good faith to reduce delays associated with paper filings and to ensure efficient participation in the litigation process. Plaintiff understands that electronic filing access is subject to the Court's discretion and agrees to comply with all requirements if granted.

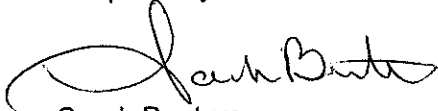
## Conclusion

For the reasons stated above, Plaintiff respectfully asks the Court to:

1. Correct the docket to reflect that Defendant Judge Calabrese has not yet been served,
2. Grant Plaintiff permission to serve Judge Calabrese at the courthouse address listed above via certified mail with return receipt, and
3. Grant Plaintiff permission to file electronically in this case via the CM/ECF system.

**Exhibit A:** USPS Certified Mail Receipt & Tracking Confirmation for Service on Defendant Ford Motor Company (Filed for the Court's record)

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sarah Buntura", with a large, stylized loop at the beginning.

Sarah Buntura

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